

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**RANDY PETTER AND ADRIENNE  
PETTER,**

*Plaintiffs,*

**V.**

**SAFECO INSURANCE COMPANY  
OF INDIANA,**

*Defendant.*

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**CIVIL ACTION NO. 4:22-cv-1281**

**DEFENDANT'S RULE 7.1 DISCLOSURE STATEMENT**

TO THE HONORABLE COURT:

Pursuant to Federal Rule of Civil Procedure 7.1, Defendant Safeco Insurance Company of Indiana, files the following Rule 7.1 Disclosure Statement:

1. Liberty Mutual Holding Company Inc. owns 100% of the stock of LMHC Massachusetts Holdings Inc.
2. LMHC Massachusetts Holdings Inc. owns 100% of the stock of Liberty Mutual Group Inc.
3. Liberty Mutual Group, Inc. owns 100% of the stock of Liberty Mutual Insurance Company; Liberty Mutual Fire Insurance Company and Employers Insurance Company of Wausau.
4. Liberty Mutual Insurance Company owns 93.060% of the stock of Liberty Insurance Holdings, Inc.
5. Liberty Mutual Fire Insurance Company owns 2.892% of the stock of Liberty Insurance Holdings, Inc.
6. Employers Insurance Company of Wausau owns 4.048% of the stock of Liberty Insurance Holdings, Inc.
7. Liberty Insurance Holdings, Inc. owns 100% of the stock of LIH US P&C Corporation.

8. LIH US P&C Corporation owns 100% of the stock of Safeco Corporation.
9. Safeco Corporation owns 100% of the stock of General Insurance Company of America.
10. General Insurance Company of America owns 100% of the stock of Safeco Insurance Company of Indiana.

None of these entities is publicly traded.

Respectfully submitted,

**THOMPSON, COE, COUSINS & IRONS, LLP**

By: /s/ Christopher H. Avery  
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**ATTORNEYS FOR DEFENDANT,  
SAFECO INSURANCE COMPANY  
OF INDIANA**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of this instrument has been served via e-filing, e-service or certified mail/regular mail on this the 21st day of April, 2022 on the following counsel of record:

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/s/ Christopher H. Avery  
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